

To: Smith, Claudia[Smith.Claudia@epa.gov]
From: Beeler, Cindy
Sent: Tue 6/7/2016 10:00:17 PM
Subject: BLM Flaring & Venting Proposed Rule vs. U&O FIP
Regulatory Requirements Comparison_r1.docx

Claudia –

I have updated the table and saved it to I:\Restricted Share\U&O FIP\Technical Support Documents\Regulatory Requirements Comparison_r1.docx, and attached it here.

The first version of this compared BLM's F&V rule that had gone to OMB. Minor differences in the emission sources that are covered in FIP/OOOO from OMB to proposed version – most differences were in the flaring/casinghead gas area.

I can't vouch for the U&O FIP reqmts in the comparison (the date on the file was 10/26/15 so not sure if the U&O FIP reqmts changed at all since then).

I did notice that the OOOOa LDAR pieces reflected proposed vs. final so changed them as well.

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